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August 8, 2003

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

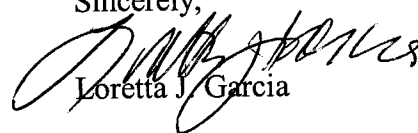
Re: Globecomm Systems, Inc.; Application for International Authorization

Dear Ms. Dortch:

The undersigned attorney filed this day, on behalf of Globecomm Systems, Inc. an Application for international authorization under Section 214 of the Communications Act, 47 U.S.C. Section 214. The Application was filed through the International Bureau Filing System (IBFS) and is identified by the number 138192. Attachment 1 includes details required by Sections 63.12 and 63.18 of the Commission's rules, 47 C.F.R. Sections 63.12 and 63.18. Attachment 2 includes information regarding owners holding 10 percent or more of the shares of Globecomm Systems, Inc.

The required fee will be submitted today by mail, along with Form 159. Please contact me if you have any questions about the Application or the attachments.

Sincerely,


Loretta J. Garcia

Attachments: as stated

ATTACHMENT 1

Globecomm Systems Inc. Compliance with the Requirements of 47 CFR Sections 63.12 and 63.18

Globecomm Systems, Inc. complies with the requirements of Sections 63.12 and 63.18 of the Commission's Rules. In support of its request for authorization as an international carrier, Globecomm Systems Inc. ("GSI") submits the following information pursuant to sections 63.12 and 63.18 of the Commission's rules.

Question 9. Does the Applicant request streamlined processing pursuant to 47 CFR Section 63.12? If yes, include in Attachment 1 a statement of how the application qualifies for streamlined processing.

Answer. GSI certifies that it is eligible for streamlined processing procedures under section 63.12 of the Commission's rules, 47 CFR § 63.12, because GSI is not affiliated with a foreign carrier in any destination market where it plans to provide services. GSI is not affiliated with a dominant U.S. carrier whose international switched or private line services GSI seeks to resell. GSI is not seeking authority to provide switched basic services over private lines to a country for which the Commission has not previously authorized the provision of switched services over private lines.

Question 10. If applying for authority to provide switched services over private lines pursuant to Section 63.16, provide the required showing in Attachment 1.

Answer. GSI is not requesting authority to provide switched services over private lines connected to the public switched network.

Question 11. If the applicant is a foreign carrier, or is affiliated (as defined in 47 CFR Section 63.09(e)) with a foreign carrier, provide in Attachment 1 the information and certifications required by Section 63.18(i) through (m).

Answer.

Section 63.18(i). GSI certifies that the applicant is not a foreign carrier and is not affiliated with any foreign carrier.

Section 63.18(j). GSI certifies that the applicant is not a foreign carrier in any country where it seeks to provide services. GSI certifies that it does not control a foreign carrier in any country in which it seeks to provide service. GSI certifies that no

foreign entity owns or controls 25 percent or greater interest in applicant; nor does applicant own or control 25 percent or greater interest in any foreign carrier. GSI certifies that no foreign carriers own, in the aggregate, more than 25 percent of the applicant and that no such entities are parties to, or the beneficiaries of, a contractual relation affecting the provision or marketing of international basic telecommunications services in the U.S.

Section 63.18(k) does not apply to GSI's request for international authorization. See responses to 63.18(i) and (j) above.

Section 63.18(l) does not apply to GSI's request for international authorization. See responses to 63.18(i) and (j) above.

Section 63.18(m) does not apply to GSI's request for international authorization. See responses to 63.18(i) and (j) above.

Question 12. Does the applicant seek authority to provide service to any destination described in paragraphs (1) through (4) of Section 63.18(j)? If yes, list those destinations in Attachment 1 as a response to question 12.

Answer. Section 63.18(j) does not apply to GSI's request for international authorization. See response to 63.18(j) above.

Question 13. Does the applicant seek authority to provide service to any destinations other than those listed in response to questions 12 where it has an affiliation with a foreign carrier? If yes, list those destinations in Attachment 1 as a response to question 13.

Answer. GSI is not seeking authority to provide service in any destinations where it has an affiliation with a foreign carrier.

Question 15. In Attachment 1, respond to paragraphs (d), (e)(3) and (g) of Section 63.18.

Answer.

Section 63.18(d). In 1997, GSI received authority under section 214 of the Act to provide international voice services as a facilities-based carrier. See Overseas Common Carrier Section 214 Applications Actions Taken, Public Notice, 13 FCC Rcd 7113, released Oct. 2, 1997. It did not provide international common carrier services and subsequently relinquished that authorization through lapse of time.

Section 63.18(e)(3) does not apply to GSI's request for international authorization. GSI is not seeking authority to transfer control of a common carrier holding international Section 214 authorization, or to acquire by assignment another carrier's existing international Section 214 authorization. .

Section 63.18(g) does not apply to GSI's request for international authorization. GSI is not seeking authority to acquire facilities or to provide services under 63.18(e)(4). No environmental assessment is necessary at this time.

ATTACHMENT 2

Globecomm Systems Inc. Ownership Information under Section 63.18(h)

Question 14. In Attachment 2, provide the name, address, citizenship and principal business of the applicant's ten percent or greater direct and indirect shareholders, and identify any interlocking directorates.

Answer. Globecomm Systems Inc. certifies that it is not affiliated with any dominant foreign or U.S. facilities-based carrier and that it has no interlocking directorates with any dominant foreign carriers.

In support of this certification, GSI provides below the names, addresses, citizenships and principal businesses of its shareholders that control ten percent (10%) or more of the company's shares:

Royce & Associates, LLC
1414 Avenue of the Americas
New York, NY 10019
Citizenship: United States
Type of business: Investment funds brokerage